DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Central Region

Food and Drug Administration
Waterview Corporate Center
10 Waterview Blvd., 3rd Floor
Parsippany, NJ 07054

Telephone (973) 526-6000

August 26, 1999

WARNING LETTER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter Ringrose, Ph.D
President, Pharmaceutical Research Institute
Bristol-Myers Squibb PRI
Rt. 206 & Province Line Road
Princeton, N.J. 08543-4000

File No. 99-NWJ-33

Dear Dr. Ringrose:

During the period of May 12 through 14, 1999 Investigator Daniel Grabicki from the U.S. Food and Drug Administration (FDA's) New Jersey District Office conducted an inspection of your Pennington, N.J. facility to determine whether your firm was in compliance with the Postmarketing Adverse Drug Experience (ADE) reporting requirements of Title 21, Code of Federal Regulations (CFR), Part 314.80 and Section 505 (k) of the Federal Food, Drug and Cosmetic Act (the Act).

Based on our review of the inspection report, we conclude that your firm violated 301(e) of the Act because it failed to comply with 21 CFR 314.80 and Section 505 (k) of the Act.

Deviations from the PADE regulations include the following:

- Failure to submit to the FDA serious and unexpected adverse drug experience reports within 15 calendar days of initial receipt of the information as required by 21 CFR 314.80(c)(1)(i).

  For example:

Drug	MCN	Mfr. receipt date	Date submitted to FDA
Paraplatin	R034943	3/31/98	12/4/98
Paraplatin	M085563	11/14/97	8/19/98
Glucophage	M085549	2/5/98	8/25/98
Glucophage	M085566	9/16/97	8/25/98

Drug	MCN	Mfr. receipt date	Date submitted to FDA
Taxol	B044314	7/23/98	2/23/99
Taxol	B043989	5/28/98	2/1/99
Taxol	B044165	6/28/98	2/11/99
Taxol	B044032	7/10/98	1/30/99
Taxol	R037448	3/17/98	12/18/99
Taxol	R037299	11/25/97	1/29/99
Taxol	R036654	1/5/98	11/5/98
Taxol	B044221	7/21/98	2/23/99
Taxol	B044266	7/22/98	2/23/99
Taxol	B044265	7/24/98	2/22/99
Taxol	B044167	7/16/98	2/11/99
Taxol	B038380	7/20/98	2/11/99

This deviation was listed on form FDA-483, "List of Inspectional Observations" which was presented to and discussed with Dr. Ken Kassler-Taub, Vice President Worldwide Safety & Surveillance at the conclusion of the inspection. We acknowledge receipt of a response to the FDA-483 from Dr. Kassler-Taub. While we note your firm's proposed corrective actions in regard to these deviations, we request that you provide us with a specific timetable for their implementation. Also, please provide specific details of your plan to achieve timely reporting from your foreign affiliates.

Late reporting deviations from PADE regulations were also brought to your attention during and after an inspection of your Princeton, New Jersey facility, conducted during the period of July 7 through 24, 1997. After completion of that inspection your firm promised to fully resolve the late reporting issues.

This letter is not intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to ensure adherence to each requirement of the Act and its regulations. The specific

violations noted in this letter may be symptomatic of serious underlying problems. You are responsible for investigating and determining the causes of the violations identified above and to prevent recurrence of similar violations.

You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. These actions may include, but are not limited to, seizure and/or injunction. Federal agencies are advised of the issuance of all Warning Letters about drugs so that they may take this information into account when considering the award of contracts.

We request that you reply in writing within fifteen (15) working days of receipt of this letter. Please direct your response to Food and Drug Administration, New Jersey District Office, Waterview Corporate Center, 10 Waterview Blvd., 3rd floor, Parsippany, New Jersey 07054 (Attn: Diane Boucher, Compliance Officer). If you have any questions or concerns, please feel free to contact her at (973) 526-6006.

Sincerely yours,

Douglas I. Ellsworth
District Director
New Jersey District Office

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